

1 Edward W. Swanson, SBN 159859
2 SWANSON, McNAMARA & HALLER LLP
3 300 Montgomery Street, Suite 1100
4 San Francisco, California 94104
Telephone: (415) 477-3800
Facsimile: (415) 477-9010

5 Attorney for BERT VOTO-BERNALES

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8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,

Case No. CR 3:06-mj-70253-JL

12 Plaintiff,

STIPULATION AND ~~PROPOSED~~
ORDER TO MODIFY CONDITIONS OF
PRETRIAL RELEASE TO PERMIT
TRAVEL

13 vs.

14 BERT VOTO-BERNALES, *et al.*,

15 Defendants.

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17 STIPULATION

18 Defendant Bert Voto-Bernales, by and through his counsel, Edward W. Swanson, and the United
19 States, by and through Assistant United States Attorney C. David Hall, hereby stipulate and agree as
20 follows:

- 21 1. On April 26, 2006, this Court set conditions of release for defendant Bert Voto-Bernales,
22 one of which was a condition that he not travel outside the Northern District of
23 California.
- 24 2. Mr. Voto-Bernales seeks permission to travel to Anaheim by car with his wife and
25 children, departing on Monday, July 31st 2006 and returning to the Bay Area on Saturday,
26 August, 5th 2006. The purpose of the trip is to visit Disneyland and Magic Mountain.

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3. Prior to July 31st, 2006, Mr. Voto-Bernales shall provide to his Pretrial Services Officer, Michelle Nero, all details about his travel plans, including addresses and phone numbers at which he can be reached.
4. United States Pretrial Services Officer Michelle Nero has no objection to the requested travel.

IT IS SO STIPULATED.

DATED: July 24, 2006

/s/
Edward W. Swanson
Swanson, McNamara & Haller LLP
Counsel for Defendant Bert Voto-Bernales

DATED: July 24, 2006

/s/
C. David Hall
Assistant United States Attorney

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 26 July 06

The Honorable James Larson, BERNARD ZIMMERMAN
United States Magistrate Judge